

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

ANDREW PERRONG,	)	Case No.: 3:18-cv-10017-BRM-LHG
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	<b><u>MOTION TO EXTEND TIME TO</u></b>
	)	<b><u>RESPOND TO COMPLAINT</u></b>
	)	
CAPITAL COMBACK LLC, et al.,	)	
	)	
Defendants.	)	
	)	
	)	
	)	
	)	
	)	

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Defendants hereby respectfully requests this Court grant a 30 day extension of time to answer, move, or otherwise respond to the Plaintiff's Complaint. Our firm was recently retained to represent the Defendants and require more time to investigate the claims alleged and to draft a dispositive motion. Defendants' counsel conferred with the Plaintiff and asked for a 30 day extension, but the Plaintiff agreed to only 14 days. Therefore, Defendants respectfully ask the Court to Grant their motion for a 30 extension of time to respond to the Complaint.

It is further represented that:

1. The original response date has not been previously extended or adjourned;
2. Plaintiff was served with Plaintiff's Complaint on June 2, 2018;
3. A response is due no later than June 25, 2018;
4. Pursuant to the extension, the response would be due no later than July 25, 2018;

Dated: June 20, 2018

Respectfully Submitted,

/s/ Daniel Zemel  
Daniel Zemel, Esq.  
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Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of June, 2018 a true and correct copy of the foregoing document was sent to Plaintiff via the Court's ECF system.

/s/ Daniel Zemel  
Daniel Zemel, Esq.